

5-4-22
1:35pm

2021R00253/DVC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

R E C E I V E D

UNITED STATES OF AMERICA : Criminal No. 22- 325 (CPO)
:
:
v. : 18 U.S.C. § 2423(b)
: 18 U.S.C. §§ 2251(a) and (e)
: 18 U.S.C. § 2422(b)
ZACHARY WILLIAMS : 18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

MAY 04 2022

AT 8:30 1:35 P.M.
WILLIAM T. WALSH
CLERK

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Camden,
charges as follows:

COUNT ONE

(Travel with Intent to Engage in Illicit Sexual Conduct)

On or about October 2, 2020, in Atlantic County, in the District of New
Jersey, and elsewhere, defendant

ZACHARY WILLIAMS

did travel in interstate commerce from the State of New York to the State of New
Jersey, for the purpose of engaging, and attempting to engage, in illicit sexual
conduct, that is, a sexual act, as that term is defined in 18 United States Code,
Section 2246, with a person under the age of eighteen, that is, Minor Victim 1,
which sexual act would constitute a violation of Title 18, United States Code,
Chapter 109A if the sexual act occurred in the special maritime and territorial
jurisdiction of the United States.

In violation of Title 18, United States Code, Section 2423(b).

COUNT TWO
(Travel with Intent to Engage in Illicit Sexual Conduct)

On or about March 13, 2021, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

ZACHARY WILLIAMS

did travel in interstate commerce from the State of New York to the State of New Jersey, for the purpose of engaging, and attempting to engage, in illicit sexual conduct, that is, a sexual act, as that term is defined in 18 United States Code, Section 2246, with a person under the age of eighteen, that is, Minor Victim 1, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction of the United States.

In violation of Title 18, United States Code, Section 2423(b).

COUNT THREE
(Sexual Exploitation of a Child)

From in or about September 2020 through on or about December 8, 2020, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

ZACHARY WILLIAMS

did knowingly employ, use, persuade, induce, entice and coerce a minor, that is, Minor Victim 1, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, knowing that such visual depictions would be transported and transmitted using a means and facility of interstate and foreign commerce, namely, the Internet, and which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FOUR
(Coercion and Enticement)

From in or about September 2020 through in or about March 13, 2021, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

ZACHARY WILLIAMS

did use a facility of interstate and foreign commerce, namely the Internet and a cellular telephone, to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT FIVE
(Possession of Child Pornography)

On or about March 13, 2021, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

ZACHARY WILLIAMS

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, including by computer, and that was produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION AS TO COUNTS ONE, TWO AND FOUR

Upon conviction of the offenses in violation of 18 U.S.C. § 2423(b) charged in Counts One and/or Two of this Indictment, and/or the offense in violation of 18 U.S.C. § 2422(b) charged in Count Four of this Indictment, the defendant,

ZACHARY WILLIAMS,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428(a):

- a. Any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offenses charged in Count One, Count Two and/or Count Four; and
- b. Any property, real or personal, that constitutes or is derived from proceeds traceable to the offenses charged in Count One, Count Two and/or Count Four.

The property to be forfeited includes, but is not limited to, the following property seized from the defendant's person on March 13, 2021, and the defendant's residence on or about March 19, 2021:

- a. An Apple iPhone 12pro, serial number DNPDWUHY0D83;
- b. An Apple iPhone 7, serial number DNPS81AHHG6W; and
- c. An Apple all-in-one MAC computer, model number A1862

(hereinafter referred to collectively as the "Specific Properties").

FORFEITURE ALLEGATION AS TO COUNTS THREE AND FIVE

Upon conviction of the offense in violation of 18 U.S.C. § 2251(a) charged in Count Three of this Indictment and/or the offense in violation of 18 U.S.C. § 2252A(a)(2)(B) charged in Count Five of this Indictment, the defendant,

ZACHARY WILLIAMS,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253: (a) all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, and 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, shipped, or received in violation of Title 18, United States Code, Chapter 109A; (b) all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in Counts Three and/or Five of this Indictment; and (c) all property, real and personal, used or intended to be used to commit or to promote the commission of the offense charged in Counts Three and/or Five of this Indictment and all property traceable to such property. The property to be forfeited includes, but is not limited to, the Specific Properties.

SUBSTITUTE ASSETS PROVISION

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c) and/or 18 U.S.C. § 2253, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL

FOREPERSON

Philip R. Sellinger by At

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 22-

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

ZACHARY WILLIAMS

INDICTMENT FOR
18 U.S.C. § 2423(b)
18 U.S.C. §§ 2251(a)(1) and (e)
18 U.S.C. § 2422(b)
18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

A True Bill. ✓

Foreperson

PHILIP R. SELLINGER
U.S. Attorney
Newark, New Jersey

DIANA VONDRA CARRIG
Assistant U.S. Attorney
Camden, New Jersey
(856) 757-5026
